

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

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9 MITSUBISHI MOTORS NORTH AMERICA,
INC., a California corporation,

10 Plaintiff,

11 v.

12 CASCADE CHRYSLER, INC., d/b/a
13 KARMART MITSUBISHI, a Washington
14 corporation,

15 Defendant.
16

No. 2:24-cv-02121-KKE

JOINT STATUS REPORT, STIPULATED
MOTION TO STAY ACTION, AND
ORDER

**NOTE ON MOTION CALENDAR:
TUESDAY, JANUARY 21, 2025**

17 **I. JOINT STATUS REPORT**

18 Plaintiff Mitsubishi Motors North America, Inc. (“MMNA”) and Defendant Cascade
19 Chrysler, Inc. d/b/a KarMART Mitsubishi (“Dealer,” or, collectively with MMNA, the “Parties”),
20 by and through their respective counsel, hereby advise the Court that the Parties are engaged in
21 meaningful settlement negotiations. Though a final agreement has not yet been reached, the Parties
22 anticipate that they will be able to do so within the next thirty (30) days. As such, the Parties have
23 prepared a stipulated motion to stay all deadlines in this action for thirty (30) days, as set forth
24 below.

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II. STIPULATED MOTION

MMNA filed its Complaint against Dealer on December 20, 2024. (Dkt. No. 1.) Dealer, through counsel, agreed to waive service of process. (Dkt. No. 12.) Dealer's current answer deadline is 60 days from the date the request for waiver was sent on December 30, 2024, *i.e.*, on or before February 28, 2025. (*See id.*) The Court issued an initial scheduling order setting a deadline of January 21, 2025 for the parties to conduct their Rule 26(f) conference, a deadline of February 3, 2025 for the parties to exchange initial disclosures, and a deadline of February 10, 2025 for the parties to submit their Joint Status Report and Discovery Plan. (Dkt. No. 10.)

However, given the Parties' progress toward settlement to date, the Parties agree it is most economical for all pending deadlines in this action to be stayed for thirty (30) days, and propose that the Parties submit an updated joint status report to the Court on or before February 20, 2025.

A proposed order for the Court's review and signature is provided below.

DATED: January 22, 2025

SEYFARTH SHAW, LLP

CSD ATTORNEYS AT LAW, LLC

By: s/ Ashley J. Sherwood

By: s/ Seth A. Woolson

Ashley J. Sherwood, WSBA No. 46885
999 Third Avenue, Suite 4700
Seattle, WA 98104
Email: asherwood@seyfarth.com

Seth A. Woolson, WSBA No. 37973
T. Todd England, WSBA No. 48788
1500 Railroad Ave.
Bellingham, WA 98225

Brandon L. Bigelow
(Admitted Pro Hac Vice)
Two Seaport Lane, Suite 1200
Boston, MA 02210
Phone: (617) 946-4800
Email: bbigelow@seyfarth.com

Email: swoolson@csdlaw.com
Email: tengland@csdlaw.com
Attorneys for Defendant Cascade
Chrysler, Inc., d/b/a

Lauren G. Leipold
(Admitted Pro Hac Vice)
1075 Peachtree St. NE, Suite 2500
Atlanta, Georgia 30309
Phone: (404) 885-1500
Email: lleipold@seyfarth.com
Attorneys for Plaintiff Mitsubishi Motors
North America, Inc.

III. ORDER

Based on the foregoing, IT IS SO ORDERED that this action, and all pending deadlines associated therewith, is hereby stayed through and until February 20, 2025.

The Clerk of the Court shall strike the Court's initial scheduling order entered in this case. (Dkt. No. 10.) The Parties shall submit a joint status report to the Court on or before February 20, 2025.

DATED this 22nd day of January, 2025.



Kymberly K. Evanson
United States District Judge

Presented by:

SEYFARTH SHAW, LLP

CSD ATTORNEYS AT LAW, LLC

By: s/ Ashley J. Sherwood

Ashley J. Sherwood, WSBA No. 46885
999 Third Avenue, Suite 4700
Seattle, WA 98104
Email: asherwood@seyfarth.com

Brandon L. Bigelow
(Admitted Pro Hac Vice)
Two Seaport Lane, Suite 1200
Boston, MA 02210
Phone: (617) 946-4800
Email: bbigelow@seyfarth.com

By: s/ Seth A. Woolson

Seth A. Woolson, WSBA No. 37973
T. Todd England, WSBA No. 48788
1500 Railroad Ave.
Bellingham, WA 98225
Email: swoolson@csdlaw.com
Email: tengland@csdlaw.com

*Attorneys for Defendant Cascade
Chrysler, Inc., d/b/a*

1 Lauren G. Leipold
2 (Admitted Pro Hac Vice)
3 1075 Peachtree St. NE, Suite 2500
4 Atlanta, Georgia 30309
5 Phone: (404) 885-1500
6 Email: lleipold@seyfarth.com

7 *Attorneys for Plaintiff Mitsubishi Motors*
8 *North America, Inc.*

9 **CERTIFICATE OF SERVICE**

10 I hereby certify that on the date below, I electronically filed the foregoing with the Clerk
11 of the Court using the CM/ECF system which will send notification of such filing to the following:

12 Seth A. Woolson, WSBA No. 37973
13 T. Todd Eglund, WSBA No. 48788
14 CSD Attorneys at Law P.S.
15 1500 Railroad Avenue
16 Bellingham, WA 98225
17 *Attorneys for Defendant Cascade Chrysler, Inc.*
18 *d/b/a KarMART Mitsubishi*

☐ via U.S. Mail, Postage Prepaid
☐ via Messenger Service
☒ via U.S.D.C. Western WA CM/ECF System
☐ via Email: swoolson@csdlaw.com;
tegland@csdlaw.com;
ktores@csdlaw.com

19 DATED this 21st day of January, 2025.

20 s/ Paul B. Mora
21 Paul B. Mora, Legal Assistant
22 Seyfarth Shaw LLP
23 999 Third Avenue, Suite 4700
24 Seattle, Washington 98104
25 Email: pmora@seyfarth.com
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